

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

SELESTER KIRKWOOD,
Debtor.

CHAPTER 13
CASE NO. 15-48179-MAR
JUDGE MARK A RANDON

TRUSTEE'S OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES the Chapter 13 Trustee, Krispen S. Carroll, and objects to confirmation of the Chapter 13 Plan in the above matter pursuant to E. D. Mich. LBR 3015-3(a) as follows:

1. Trustee objects to debtor counsel's failure to submit a Payment Order within 14 days after filing the Chapter 13 Petition in compliance with E. D. Mich. LBR 1007-1(c). Based upon debtor's sources of income, Trustee requires debtor counsel to provide the appropriate order excusing and allowing for payments to be paid by ACH and for the debtor to immediately provide the documents necessary to effectuate the same.

2. Trustee requests a copy of debtor's whole life insurance policy(ies) and recent statements.

3. Pursuant to debtor's testimony at the § 341 First Meeting of Creditors with respect to the correct address, Trustee objects to debtor's failure to comply with F.R.Bankr.P. 4002(a)(5).

4. As debtor's entire budget is only \$547.00 per month after deducting the rent expense and debtor has failed to account for clothing, personal care, medical/dental expenses, transportation or entertainment, Trustee objects to the feasibility of debtor's Chapter 13 Plan pursuant to 11 U.S.C. § 1325(a)(6).

WHEREFORE, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan.

OFFICE OF THE CHAPTER 13 TRUSTEE-DETROIT
Krispen S. Carroll, Chapter 13 Trustee

July 30, 2015

/s/ Margaret Conti Schmidt
KRISPEN S. CARROLL (P49817)
MARGARET CONTI SCHMIDT (P42945)
MARIA GOTSIS (P67107)
719 Griswold Street
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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed **TRUSTEE'S OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN** with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

ANDREAS M GETSCHMANN
33680 FIVE MILE ROAD
LIVONIA, MI 48154-0000

and I hereby certify that I have mailed by United States Postal Service the above mentioned documents to the following non-ECF participants:

SELESTER KIRKWOOD
4 ALEXANDRIA TOWNE ST
SOUTHFIELD, MI 48075-0000

July 31, 2015

_____/s/ Barbara A. Ecclestone
Barbara A. Ecclestone
For the Office of the Chapter 13 Trustee-Detroit
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